



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MRG/KCB/SMS/GN
F. #2021R00498

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 28, 2023

By E-Mail and ECF

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Re: United States v. Xu, et al.
Criminal Docket No. 22-158 (S-1) (ENV)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery in the above-captioned case. This production supplements the previous productions provided under cover of letters dated April 18, 2022 (as to certain individual defendants), May 20, 2022 (as to all defendants), June 15, 2022 (as to certain individual defendants), July 11, 2022 (as to all defendants), November 9, 2022 (as to all defendants), January 23, 2023 (as to all defendants), January 25, 2023 (as to certain individual defendants), April 19, 2023 (as to all defendants), and September 27, 2023 (as to certain individual defendants), and October 4, 2023 (as to all defendants).¹

¹ In the government's discovery cover letter dated October 4, 2023, the government inadvertently described CHEN-ET-AL-058158 as "Inventory of items recovered during search warrant execution at 1305 Greenville Avenue Unit #375, Richardson, Texas 75081." The

Please contact DupeCoop at dupecoop@mac.com and reference the above-captioned case to obtain a copy of the discovery. The government renews its request for reciprocal discovery from each defendant.

Enclosed please find the following:

Bates Range	Description	Protective Order Designation
CHEN-ET-AL-058708	A forensic extraction of a phone with FBI Identification Number 1B201, believed to be used by Yuan Yuan Chen	Sensitive Discovery Material
CHEN-ET-AL-058709	A forensic extraction of a phone with FBI Identification Number 1B207, believed to be used by Yichu Chen	Sensitive Discovery Material
CHEN-ET-AL-058710	Responsive records of a phone with FBI Identification Number 1B149, believed to be used by Jiaxing Li	Sensitive Discovery Material
CHEN-ET-AL-058711 – CHEN-ET-AL-058763	Records from JPMorgan Chase for an account believed to belong to Yichu Chen*	
CHEN-ET-AL-058764 - CHEN-ET-AL-058765	Two recordings of a WeChat message thread containing messages believed to be exchanged between Bo Jiang and another individual ²	Sensitive Discovery Material

material is “Inventory of items recovered during search warrant execution at **1705** Greenville Avenue Unit #375, Richardson, Texas 75081.”

² Screenshots of these messages were previously produced at CHEN-ET-AL-045272 – CHEN-ET-AL-045277.

In addition, in the government’s discovery letter dated October 4, 2023, the government identified CHEN-ET-AL-045282 as “A recording of a WeChat message thread containing messages believed to be exchanged between Bo Jiang and another individual.” The previously produced recording stamped CHEN-ET-AL-045282 is a recording of a WeChat message thread containing messages believed to be exchanged between **Rong Rong Xu** and another individual. The newly produced recordings stamped CHEN-ET-AL-058764 – CHEN-ET-AL-058765 are recordings of a WeChat message thread containing messages believed to be exchanged between Bo Jiang and another individual.

Bates Range	Description	Protective Order Designation
CHEN-ET-AL-058766	A screenshot of text messages believed to be exchanged between Rong Rong Xu and another individual	Sensitive Discovery Material
CHEN-ET-AL-058767 – CHEN-ET-AL-058858	Records from Discover Financial Services* for account holder “Yi Yang”	
CHEN-ET-AL-058859 – CHEN-ET-AL-062001	Records for phone number ending in -1208*	
CHEN-ET-AL-062002 - CHEN-ET-AL-062091	Records for phone number ending in -1840, believed to be used by Johnnie Kim*	
CHEN-ET-AL-062092 – CHEN-ET-AL-062094	Records related to IP address 108.29.32.168 registered to Raymond Yan*	
CHEN-ET-AL-062095 – CHEN-ET-AL-062097	Records for phone number ending in -2657*	
CHEN-ET-AL-062098 – CHEN-ET-AL-062099	Records for phone number ending in -7566* ³	
CHEN-ET-AL-062104 – CHEN-ET-AL-062110 ⁴	Records from Southwest Airlines for Raymond Yan on or about June 10, 2020	
CHEN-ET-AL-062114 – CHEN-ET-AL-062297 ⁵	Records from JPMorgan Chase for accounts believed to belong to Siyang Chen, Jilong Yu, Rong Rong Xu and others	
CHEN-ET-AL-062298 - CHEN-ET-AL-066181	Records for phone number ending in -6299, believed to be used by Jiaying Li*	
CHEN-ET-AL-066182 – CHEN-ET-AL-066185	Records from Delta Airlines for Jane Doe #14 on or about April 8, 2021 and April 23, 2021*	Sensitive Discovery Material

³ The certification for these records is bates-stamped CHEN-ET-AL-062095.

⁴ CHEN-ET-AL-062100 – CHEN-ET-AL-062103 is intentionally omitted.

⁵ CHEN-ET-AL-062111 - CHEN-ET-AL-062113 is intentionally omitted.

Bates Range	Description	Protective Order Designation
CHEN-ET-LA-066186	Responsive records from a phone with FBI Identification Number 1B201, believed to be used by Yuan Yuan Chen	Sensitive Discovery Material

Pursuant to Federal Rules of Evidence 902(11) and 902(13), the government hereby gives notice that it intends to introduce at trial documents pursuant to Federal Rules of Evidence 803(6), 902(11) and 902(13). The records the government intends to introduce under these rules are marked with an asterisk, and the certifications for such records are enclosed with the records. For records produced previously, the government will identify which records it intends to introduce under Federal Rules of Evidence 902(11) and (13) and the appropriate certification.

If you have any questions regarding discovery or would like to discuss a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

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Enclosures

cc: Clerk of the Court (ENV) (by ECF) (without enclosures)
Counsel for the Defendants (by Email and ECF)